

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BANCO POPULAR DOMINICANO, C. Por A.

Plaintiff and Counterclaim Defendant,

vs.

LEVI STRAUSS & CO.,

Defendant and Third Party Plaintiff,

vs.

**INTERAMERICANA APPAREL COMPANY, INC.;
INTERAMERICANA PRODUCTS
INTERNATIONAL, S.A.; QST DOMINICANA
LLC; US PAPER & CHEMICAL; APPAREL
MACHINERY & SUPPLY CO.; YKK SNAP
FASTENERS AMERICA, INC.; SOUTHERN
TEXTILE DOMINICANA, INC; INDUSTRIA
CARTONERA DOMINICANA, S.A. (Smurfit);
THE GRAPHIC LABEL GROUP DOMINICANA,
INC.; and TAG-IT PACIFIC, INC.,**

Third-Party Defendants.

07 Civ. 6443 (LTS)(THK)

**THIRD PARTY DEFENDANT
QST DOMINICANA LLC'S
NOTICE OF MOTION TO
DISMISS FOR FORUM NON
CONVENIENS**

PLEASE TAKE NOTICE that, upon the Complaint ("Complaint") of Plaintiff Banco Popular Dominicano, C. por A. and the Third Party Complaint ("Third Party Complaint") of Levi Strauss & Co. ("Levis")(Exhibits 1 and 2 hereto, respectively), and the Memorandum of Law in Support of Third Party Defendant's Motion to Dismiss, Third Party Defendant QST Dominicana LLC ("QST"), by its attorneys, Vedder, Price, Kaufman & Kammholz, P.C., will move this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 17C, at a date and time to be determined by the Court, for an order dismissing the case pursuant to FRCP 12(b)(3) for *forum non conveniens* and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), opposing papers, if any, must be served on the undersigned no later than November 12, 2007.

Dated: New York, New York
October 24, 2007

Respectfully submitted,

VEDDER, PRICE, KAUFMAN & KAMMHOLZ, P.C.

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Apparel Machinery & Supply Co.
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Miami, Florida 33176

Interamericana Apparel Co., Inc.
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